Notification of Compliance Status

Regulation 1138 – Section 16

Emission Standards for Area Source
Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

Submittal Date: If the performance test was conducted on or after December 2, 2010, the notification of compliance status must be submitted no later than 60 days following the completion of the performance test. If the performance test was conducted prior to December 2, 2010, the notification of compliance status must be submitted in accordance with the instructions for the use of the "Notification of Compliance Status" form, see page 1 of 4 of the instructions.

[1] **Name of the facility:** Roofs 'R Us, Inc

[2] **Physical location –** Street Address: 219 Duncan Road

City, State, Zip Code : Marshallton, DE 19808

[3] **Name of Owner or Operator:** Benjamin A. West

[4] **Identify the methods from Appendix A of 40 CFR Part 60 that were used to determine initial compliance.**

	Circle the applicable methods used
• To select the sampling locations and the number of traverse points	1 (1A)
• To determine the velocity and volumetric flow rate	2 2A 2C 2D (2F) 2G
• To determine the gas molecular weight used for flow rate determination	3 3A (3B)
• To measure the moisture content of the stack gas	(4)
• To measure the PM emissions	(5A)
• To measure the PAH emissions	23
• Other methods used	Not applicable

[5] **Identify the types and quantity of hazardous air pollutants emitted from the asphalt processing and asphalt roofing products manufacturing operations.**

During the performance testing, were the results used to determine compliance based on measuring polycyclic aromatic hydrocarbons (PAHs) or on measuring particulate matter (PM), as a surrogate for PAHs?

Check applicable box below

☐ Measured PAHs ☑ Measured PM, as a surrogate

Asphalt processing emission points		Lbs / ton of asphalt charged to the blowing still: PAH emissions	PM emissions
AP emission point #1	SK-22	NA	**0.9**
AP emission point #2		NA	NA
AP emission point #3		NA	NA

Asphalt roofing products manufacturing emission points		Type of operation [A]	Lbs / ton of asphalt roofing product manufactured: PAH emissions	PM emissions
RP emission point #1	SK-28	**C**	NA	★ **0.92**
RP emission point #2			NA	NA
RP emission point #3			NA	NA
RP emission point #4			NA	NA
RP emission point #5			NA	NA

Note **A:** Indicate the type of operation with "**C**" (coater only), "**S**" (saturator only) or "**CS**" (combined saturator & coater)

Notification of Compliance Status

Regulation 1138 – Section 16

Emission Standards for Area Source
Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

[6] **Provide a description of the air pollution control equipment (or process conditions) for each emission point, including each control device (or process conditions) for polycyclic aromatic hydrocarbons (or its surrogate, particulate matter) and the control efficiency (percent) for each control device (or process condition).**

Emission points	Description of the air pollution control equipment (or process conditions, if a control device is not required)	Control Efficiency, %
AP emission point #1 SK-22	A Flame-Tec thermal oxidizer is used to control the emission from the blowing stills. The burner has a 0.75 million BTU/Hour capacity and is fired on natural gas. The residence time is 0.7 seconds at the maximum operating temperature of 1800°F.	**Unknown**
AP emission point #2	**NA**	
AP emission point #3	**NA**	
RP emission point #1 SK-28	An Aero-Pulse reverse air bag house is used to control the "hot" exhaust emissions from the roofing products manufacturing lines. The bag house is compartmentalized for continuous operation and the air to cloth ratio is 2.5 to 1. Normal operating temperature is 180°F and the differential pressure is 4 to 6 inches of water.	**Unknown**
RP emission point #2	**NA**	
RP emission point #3	**NA**	
RP emission point #4	**NA**	
RP emission point #5	**NA**	

Notification of Compliance Status

Regulation 1138 – Section 16

Emission Standards for Area Source
Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

Name of the facility: Roofs 'R Us, Inc

[7] **Describe the methods that will be used for determining continuing compliance for each emission point, including a description of the monitoring requirements, the reporting requirements, and the test methods.**

Emission points	Description of monitoring requirements, the reporting requirements, and the test methods that will be used to determine continuing compliance
AP emission point #1 SK-22	Two thermocouples are installed in the combustion zone of the thermal oxidizer; one is redundant or a backup. The output of each thermocouple is connected to an Abaci electronic recorder/processor that displays and records the temperature of the "selected" input (either of the thermocouples) once every 15 minutes. The Abaci also calculates and records the 3-hour average combustion zone temperature.
AP emission point #2	**NA**
AP emission point #3	**NA**
RP emission point #1 SK-28	One thermocouple is installed in the inlet to the Aero-pulse bag house. One differential pressure measuring device is installed in each compartment of the bag house (two devices total). The output of thermocouple and the output of each differential pressure measuring device are connected to its respective Abaci electronic recorder/processor. The three Abacis displays and records the temperatures and differential pressures once every 15 minutes. The three Abacis also calculates and records the 3-hour average inlet gas temperature and 3-hour average pressure drops across the filters.
RP emission point #2	**NA**
RP emission point #3	**NA**
RP emission point #4	**NA**
RP emission point #5	**NA**

Notification of Compliance Status

Regulation 1138 – Section 16

Emission Standards for Area Source
Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

[8] **Was the performance test, upon which the determination of initial compliance was made, conducted prior to December 2, 2010?**

Check applicable box below

☐ Yes, before 12/2/10 ☑ No, on or after 12/2/10

[9] **If "Yes" is checked in Item 8 above, the owner or operator shall answer the questions below. If "No" is checked in Item 8, the owner or operator skips Item 9 and proceeds to Item 10.**

Indicate with a check mark the answer to the following questions.	**Check, as appropriate** **Yes**	**No**
Was the previous performance test conducted within the last 5 years?		
Have any changes been made to the process since the date of the previous performance test?		
Did the operating conditions, test methods, and test procedures used for the previous performance test conform to the requirements of 3.7, 16.5.8, and 16.8 of Regulation 1138?		
Was the data used to establish the value or range of values of the process or control system parameters, as specified in 16.6.1, 16.6.2, 16.6.4, 16.6.6, or 16.6.7 of Regulation 1138, recorded during the previous performance test?		

[10] **The owner or operator shall certify compliance with Section 16 of Regulation 1138 by checking the box of the following compliance statement, if appropriate.**

★ ☐ I, the owner or operator, certify that the source has complied with all applicable requirements of Section 16 of Regulation 1138.

If the owner or operator cannot certify compliance with all applicable requirements of Section 16 of Regulation 1138 above, the owner or operator provides the information needed in Item 14 on Page 5.

[11] **I certify that all the statements and information contained in this notification are true, accurate, and complete.**

Printed Name: Benjamin A. West

Title/Position: Plant Manager Telephone No: 302-555-2083

Email Address: bawest@roofsrus.com

Signature: *Benjamin A. West* Date : July 9, 2011

[12] **ATTACH the following to this "Notification of Compliance Status" form, (1) the performance test results, (2) the continuous parameter monitoring system performance evaluation results, and (3) the results of other monitoring procedures or methods that were conducted in order to demonstrate initial compliance with Section 16.**

[13] **The owner or operator must submit this "Notification of Compliance Status" form with attachments to the following agencies by the submittal date provided on page 1 of this form. Remember to keep a copy of this notification.**

Delaware Department of Natural Resources
and Environmental Control
Director of Air Quality
Blue Hen Corporate Mall
655 S. Bay Road, Suite 5N
Dover, DE 19901

U. S. Environmental Protection Agency
Director, Air Protection Division
1650 Arch Street
Philadelphia, PA 19103

Notification of Compliance Status

Regulation 1138 – Section 16

Emission Standards for Area Source
Asphalt Processing and Asphalt Roofing Products Manufacturing Operations

Name of the facility: Roofs 'R Us, Inc

[14] **If the owner or operator did not certify initial compliance with all applicable requirements of Section 16 in Item 10, provide a complete explanation of the noncompliance, a description of the corrective actions being taken to achieve compliance, and the expected date for achieving compliant operation.**

Explanation of noncompliance

The results of the performance test indicated that the Aero-Pulse bag house did not capture and collect the particulate matter in the "hot" exhaust streams to the extent necessary to comply with 16.4.2.2.2 of Section 16. Requirement 16.4.2.2.2 limits the emissions of particulate to 0.06 lbs of PM per ton of asphalt roofing product manufactured. The results of the performance test indicated the actual emissions were 0.92 lbs of PM per ton of asphalt roofing product manufactured or roughly 50% higher than allowed.

The facility was in compliance with all other applicable requirement of Section 16.

Description of the corrective actions being taken to achieve compliance

1. Since determining that the emissions from the existing bag house did not comply with the emission limitation, we have undertaken a technical analysis to assess whether there are any options that would provide compliant operation of the existing bag house. For example, alternative filter media; dedicating the existing bag house to one or two of the four roofing products manufacturing lines and installing new filters on the other lines; adding a pre-coating layer to the filter bags, etc. We expect to complete this activity by 8/15/11.

2. If we identify potential solutions in Step 1 that could result in compliant operation, we would expect install the modifications and to conduct additional performance testing. We expect to complete this activity by 10/15/11.

3. If Step 1 does not provide a path forward to a compliant operation using the existing bag house, we plan to assess the availability and feasibility of other control technologies. We expect to begin this activity by 11/1/11 and to complete this activity by 2/15/12.

Expected date for achieving compliant operation

- If a simple modification of the existing bag house is successful, we would expect to achieve compliant operation by 10/15/11.

- If modification of the existing bag house is successful, but additional control devices are needed, we would expect to achieve compliant operation by 1/31/12.

- If the existing bag house cannot be successfully modified and is replaced with a new control technology, we would expect to achieve compliant operation by 6/30/12.